

MICHAEL TUBACH (SBN 145955)
 O'MELVENY & MYERS LLP
 Two Embarcadero Center, 28th Floor
 San Francisco, CA 94111
 Telephone: (415) 984-8700
 Facsimile: (415) 984-8701
 Email: mtubach@omm.com

IAN SIMMONS (*pro hac vice*)
 O'MELVENY & MYERS LLP
 1625 Eye Street NW
 Washington, DC 20006
 Telephone: (202) 383-5300
 Facsimile: (202) 383-5414
 Email: isimmons@omm.com

Attorneys For Defendants

**SAMSUNG ELECTRONICS CO., LTD.; and
 SAMSUNG ELECTRONICS AMERICA, INC.**

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

) Case No.: 3:07-cv-5944 SC
)
) MDL No. 1917
)

This Document Relates To:

DIRECT PURCHASER ACTIONS and
 INDIRECT PURCHASER ACTIONS

) **DECLARATION OF IAN SIMMONS IN**
) **SUPPORT OF SAMSUNG ELECTRONICS**
) **CO., LTD., AND SAMSUNG**
) **ELECTRONICS AMERICA, INC.'S**
) **REQUEST FOR JUDICIAL NOTICE**

) Date: August 4, 2009

) Time: 9:00 a.m.

) Before: The Honorable Charles A. Legge, U.S.
) District Judge (Ret.), Special Master
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DECLARATION OF IAN SIMMONS

I, Ian Simmons, declare as follows:

1. I am admitted *pro hac vice* to practice law before the U.S. District Court, in the Northern District of California. I am an attorney with the law firm of O'Melveny & Myers LLP, counsel of record for Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. ("the SE Defendants"). I submit this Declaration in support of the SE Defendants' Request for Judicial Notice filed in support of their Motion to Dismiss Direct Purchaser Plaintiffs' Consolidated Amended Complaint and Indirect Purchaser Plaintiffs' Consolidated Amended Complaint. I have personal knowledge of the facts set forth herein and if called as a witness, I could and would competently testify thereto.

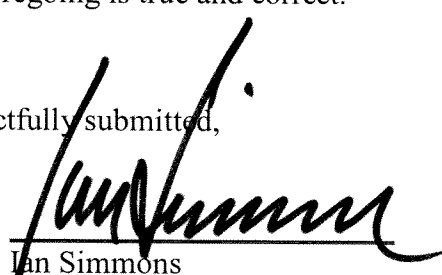
2. Attached as Exhibit A to this Declaration is a true and correct copy of the Indictment filed in *United States v. Cheng Yuan Lin*, No. CR-09-0131 WHA (N.D. Cal.), filed February 10, 2009.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 18, 2008

Respectfully submitted,

By:


Ian Simmons